

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed June 30, 2006. Claims 1-4, 6-16, 18-46, and 48-51 are pending in the Application and are rejected in the Office Action. For the reasons given below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and allowance of all pending claims.

Section 102 Rejections

The Office Action rejects Claims 1-4, 6-16, 18-46, and 48-51 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,798,767 issued to Alexander et al. ("*Alexander*").

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987); M.P.E.P § 2131. In addition, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claims" and "[t]he elements must be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); M.P.E.P § 2131 (*emphasis added*).

Claim 1 of the Application recites the following:

A method for call routing, comprising:
receiving a call request at a first call manager from a first telephony device coupled to a packet-based network, the call request including a telephone number associated with a second telephony device;
accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and
communicating the call request to a second call manager controlling the gateway device included in the route list.

Independent Claims 13, 33, and 44 recite similar, although not identical, limitations.

Independent Claim 1 is allowable because *Alexander* does not disclose each and every one of these limitations. For example, *Alexander* does not disclose “accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device” or that “the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices,” as required by Claim 1.

For a teaching of the recited route list, the Office Action cites to alternate number list 100 of Figure 3 from *Alexander*. However, there is no disclosure in *Alexander* that the alternate number list can be accessed “to determine a port of a gateway device operable to transmit the call request to the second telephony device.” The alternate number list does not include any identification of any ports of any gateway devices and *Alexander* does not disclose accessing alternate number list to determine a port of a gateway device. Furthermore, the Office Action provides no explanation as to how the alternate number list could be accessed “to determine a port of a gateway device operable to transmit the call request to the second telephony device.”

For a teaching of the recited one or more route groups, the Office Action cites to address mapping table 120 of Figure 4A from *Alexander* and points to the group names 123 in that table. As required by Claim 1, the route list comprises one or more route groups. However, the item that the Examiner argues is the route list (alternate number list 100) clearly does not comprise the item that the Office Action argues is the route group (address mapping table 120). These are two separate items in the call manager. Furthermore, the item that the Office Action argues is the route group (address mapping table 120) also clearly does not include “a list of one or more ports of one or more gateway devices,” as required by Claim 1. The group names 123 are not such a list of ports. In fact, regardless of what table or list of *Alexander* that the Examiner might try to argue is a route list or route group, none of these tables or lists includes “a list of one or more ports of one or more gateway devices.”

Therefore, *Alexander* does not disclose *each and every* limitation of Claim 1 as required by the patent law. Furthermore, independent Claims 13, 33, and 44 contain similar

limitations and are allowable for analogous reasons. Therefore, Applicants respectfully request reconsideration and allowance of Claims 1, 13, 33, and 44, as well as those claims that depend from these independent claims.

Although Applicants believe that many of the dependent claims contain additional limitations that are not disclosed in *Alexander*, Applicants will specifically address the rejection of Claim 3, 11, 15-16, 19, 27-32, 35-36 and 45-46 as an example. Certain of these claims recite a route list control process and various limitations relating to such a route list control process; however, the Office Action does explain how such a process is disclosed in *Alexander* (much less how the specific limitations associated with this process are disclosed). Furthermore, the specific limitations of Claims 27-32, relating to a route plan and associated limitations, are not mentioned at all in the Office Action. If the Examiner is to maintain the rejection of Claims 3, 11, 15-16, 19, 27-32, 35-36 and 45-46, Applicants respectfully request that the Examiner specifically address each and every limitation of each of these claims as is required by the case law and the M.P.E.P. These claims include a variety of different limitations and cannot be summed up and rejected in a sentence, as was done in the present Office Action. Applicants cannot address a rejection of this type since Applicants cannot ascertain the Examiner's reasoning for finding a disclosure of each of these numerous limitations in *Alexander*. Favorable action is respectfully requested.

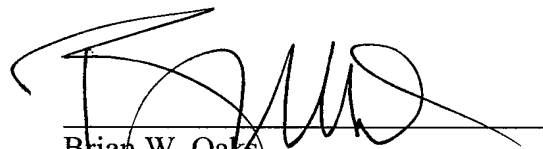
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

Although no fees are believed to be due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
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